



State of South Carolina

Office of the Governor

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December 21, 1999

Ms. Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
United States Department of Energy
Post Office Box 30307, M/S 010
North Las Vegas, Nevada 89036-0307

Dear Ms. Dixon:

I am writing to express my support of and agreement with the Department of Energy's "Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada." The EIS concludes that the construction of a deep geologic disposal facility at Yucca Mountain provides the safest and most cost-effective option for the final disposition of commercial and defense high-level nuclear waste, and the State of South Carolina supports these conclusions for the following reasons.

Responsibility:

It is the responsibility of the federal government to take title to commercial high-level waste, a fact established by the Nuclear Waste Policy Act of 1982 and re-confirmed by recent litigation.

Safety:

The draft EIS finds that deep geologic disposal at Yucca Mountain is the best way to safely isolate high-level commercial nuclear waste and defense waste.

- The underground disposal facility will most efficiently isolate waste from the environment, given its natural geological features and low water table.
- Consolidating the waste in one location facilitates waste retrieval, in the event that such action becomes necessary.
- Central storage also facilitates waste monitoring. This is especially important since weapons-grade plutonium is included in the waste mix. The facility is designed to remain stable after 100 years of monitoring. In the unlikely event of a loss of institutional control, the waste would already be safely isolated from mankind and the environment.

The no action alternatives explored in the draft EIS are unacceptable to South Carolina. Scenario 1 assumes that the waste would remain in storage under institutional control at commercial and defense nuclear sites for 10,000 years. Scenario 2 assumes that the waste would remain under effective institutional control for only 100 years.

- SC would have seven de facto commercial high-level waste disposal facilities and one defense high-level waste disposal facility within its borders. These facilities would rest on areas that were never intended to be permanent disposal sites, and that would never receive licenses for that purpose based on current Nuclear Regulatory Commission standards.
- It is not reasonable to assume institutional controls would remain in place after 100 years. Facilities not designed for this type of long-term operation would degrade, causing an environmental and health catastrophe for centuries to come.

Equity:

South Carolina has done its share for both the defense of the country and ensuring the safe disposal of most of the nation's commercial low-level radioactive waste. Failure to develop the site at Yucca Mountain could have an adverse effect on the work carried out at the Savannah River Site, as South Carolina is hesitant to continue accepting waste that has no clear path for final disposition.

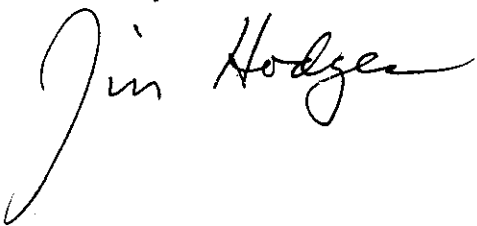
Costs:

It is significantly more cost efficient to dispose of materials at one site. The draft EIS estimates the cost at 28.8 billion dollars for construction, transportation, emplacement, operation and 100 years of monitoring. It would cost 51.5 to 56.7 billion dollars to dispose of HLW on-site in dry-storage canisters at reactors across the country for the first 100 years. Costs rise to \$480 million to \$529 million per year for the remaining 9,900 years of storage under Scenario 1.

- South Carolina utilities, at a cost passed on to consumers, have already contributed 1.05 billion dollars into the Nuclear Waste Fund.
- The extra cost to utilities and consumers under no-action Scenarios 1 and 2 are simply unacceptable, especially given the increased risk of environmental damage that will likely occur after the first 100 years of storage.

Thank you for your consideration in this matter. Please contact John Clark, Governor's Office staff, at (803) 737-8039 if you have any questions regarding this letter.

Sincerely,



Jim Hodges

cc: Jerry Hardin, Westinghouse Government Services
David Wilson, South Carolina Department of Health and Environmental Control
Ann Clark, South Carolina Department of Health and Environmental Control